

IN THE CIRCUIT COURT FOR BALTIMORE CITY

CHARLES N. CURLETT, JR. *
3424 Guilford Terrace *
Baltimore, Maryland 21218 *

Plaintiff, *

v. * Case No. _____

IVAN J. BATES *
8743 Weathered Stone Way *
Laurel, Maryland 20723 *

Defendant. *

* * * * *

COMPLAINT FOR DECLARATORY JUDGMENT

Plaintiff Charles N. Curlett, Jr. ("Curlett"), appearing *pro se*, files this Complaint for Declaratory Judgment and states the following in support thereof.

INTRODUCTION

1. This is an action brought to ensure the integrity of the 2018 Election for Baltimore City State's Attorney. The Baltimore City State's Attorney is the chief law enforcement officer for the City of Baltimore. As such, a candidate for that office must embody the highest ideals of the legal profession in honoring his or her commitment to upholding the Constitution of the State of Maryland, and the laws of the State of Maryland and the City of Baltimore. This includes meeting the residency requirement of the Maryland State Constitution.

2. The Maryland State Constitution, Article V, § 10, requires a candidate for the office of State's Attorney to have "resided for at least two years, in the county, or city in which he may be elected." The word "resided" has expressly been held by the Court of Appeals to mean domiciled. *Oglesby v. Williams*, 372 Md. 360, 371 (2002). "A person may have several places of abode or dwelling,

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CIVIL DIVISION
CIRCUIT COURT FOR BALTIMORE CITY

but he can have only one domicile at a time.” *Oglesby*, 372 Md. at 373 (citing *Roberts v. Lakin*, 340 Md. 147, 153 (1995).)

3. The “constitutional requirement for residency is a strict rubric [and] . . . [w]hile the precise words are not within the constitutional provision, a candidate for the office of State’s Attorney must live for two years immediately prior to the election within the county in which he or she runs.” *Oglesby*, 372 Md. at 367. The residency requirement “must be fulfilled pre-election.” *Id.* at 383-384.

4. Ivan J. Bates (“Bates”) publicly announced his candidacy for the office of the State’s Attorney for Baltimore City on August 26, 2017. Because Bates has resided in Howard County for the past 5 years, and not in Baltimore City, he does not meet the residency requirement of the State Constitution. It is therefore incumbent upon the courts to decide the issue and rule upon the legitimacy of Bates’s candidacy for that office.

PARTIES

5. Plaintiff Curlett is a registered voter and resident of Baltimore City and has been so for over 11 consecutive years. Curlett has registered a candidate committee with the Maryland State Board of Elections and has publicly stated that he intends to seek the office of the Baltimore City State’s Attorney in 2018. (Exh. A). Curlett has not yet filed a certificate of candidacy with the State Board of Elections.

6. Defendant Bates is either a resident of Howard County or of Baltimore City. Bates has announced that he is a candidate for Baltimore City State’s Attorney. Bates has not yet filed a certificate of candidacy with the State Board of Elections.

JURISDICTION AND VENUE

7. This is a Complaint seeking Declaratory Judgment pursuant to Md. Code Ann., Courts and Judicial Proceedings § 3-401, *et seq.*

8. This Court has subject matter jurisdiction pursuant to Md. Code Ann., Courts and Judicial Proceedings §§ 1-501 and 3-403, and Md. Election Law Code Ann. § 5-305.

9. This Court has venue pursuant to § 6-201(a) of the Courts and Judicial Proceedings of the Maryland Annotated Code and Md. Election Law Code Ann. § 5-305.

FACTS IN SUPPORT OF COMPLAINT

10. Property records on file with the Maryland State Department of Assessments and Taxation (“SDAT”) indicate that on or about September 11, 1997, Bates purchased property located at 724 Reservoir Road, Baltimore Maryland, 20217. (Exh. B). Bates is still listed as the owner of that property. *Id.*

11. SDAT records further indicate that on or about October 12, 2012, Bates purchased property at 8743 Weathered Stone Way, Laurel, Maryland 20723. (Exh. C). Bates is still listed as the owner of that property. *Id.* Upon information and belief, Bates maintained that address as his primary residence, and thus his domicile, until at least early 2017. Further, that address may continue to be his residence in fact.

12. SDAT records further indicate that on or about January 8, 2016, Bates purchased property located at 1614 Rampart Mews, Baltimore, Maryland 21230. (Exh. D). Bates and Valention A. Asuncion are listed as the current owners of that property. *Id.* Upon information and belief, Bates is currently registered to vote at that address.

13. On March 27, 2017, Bates registered a candidate committee – “Friends of Ivan Bates” – with the Maryland State Board of Elections. Bates listed his residential address as 1614 Rampart Mews, Baltimore, Maryland 21230. (Exh. E.).

14. On March 30, 2017, the *Baltimore Sun*, covering the formation of Bates’s candidate committee, reported, “Bates said he moved back to Baltimore earlier this year, and records show he

resides in Locust Point.” (Exh. F). Crediting the accuracy of the reporting, and Bates’s own admission, it appears that Bates did not reside in Baltimore immediately prior to 2017.

15. On August 26, 2017, Bates publicly announced his candidacy for Baltimore City State’s Attorney. (Exh. F).

16. That same day, the *Baltimore Sun* reported, “Bates is registered to vote at a property he owns in Locust Point but also still owns a home in Howard County, according to public records.” *Id.*

17. The Democratic Primary Election for Baltimore City State’s Attorney will be held on June 26, 2018.

18. To satisfy the state constitutional requirement, Bates is required to have resided in Baltimore since no later than June 26, 2016. Because it appears Bates moved to Baltimore no earlier than 2017, if at all, he does not meet the requirement and is ineligible for office.

COUNT I

(DECLARATORY JUDGMENT)

19. Curlett incorporates the allegations of paragraphs 1-18 as if fully set forth herein.

20. Curlett seeks a declaration in accordance with the Maryland Declaratory Judgment Act, Courts and Judicial Proceedings § 3-401 *et seq.*

21. There exists an actual controversy of a justiciable issue between Curlett and Bates within the jurisdiction of this Court, involving the rights and liabilities of the parties, which is ripe for adjudication.

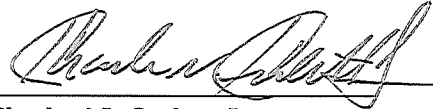
22. Antagonistic claims are present between the parties. These claims indicate imminent and inevitable litigation.

23. A declaratory judgment by this Court will terminate this controversy.

WHEREFORE, Plaintiff Charles N. Curlett, Jr. respectfully requests that:

- A. This Court declare that Defendant Ivan J. Bates is ineligible to appear as a candidate on the ballot for Baltimore City State's Attorney in the 2018 Gubernatorial election cycle; and
- B. Plaintiff be granted costs and such other relief as the nature of this case may require.

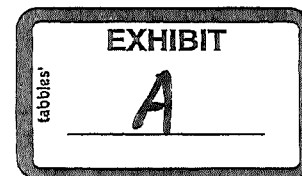
Respectfully submitted,



Charles N. Curlett, Jr.
LEVIN & CURLETT LLC
300 E. Lombard Street, Suite 1510
Baltimore, Maryland 21202
Tel: 410-685-4444
Fax: 410-685-2222
ccurlett@levincurlett.com

Plaintiff Pro Se

baltimoresun.com



Baltimore attorney says he will run against Marilyn Mosby in 2018

Justin Fenton
January 9, 2017

Baltimore State's Attorney Marilyn J. Mosby has her first challenger, should she seek reelection next year.

Attorney Charles N. "Chad" Curlett Jr., a former New York prosecutor, told The Baltimore Sun that he will run for top prosecutor in the Democratic primary next June. He filed preliminary campaign paperwork in the fall, and again last week.

"I think Baltimore needs new leadership in the state's attorney's office," Curlett said. "I think the voters will agree, and I think I can make Baltimore safer and can improve the office."

Curlett said he will make a formal announcement later.

Mosby, who drew national attention with her decision to file criminal charges against six officers in the 2015 arrest and death of Freddie Gray, has given no indication that she will not seek reelection. She did not respond to requests for comment Monday about her plans for 2018.

Others are rumored to be considering runs for state's attorney, but no one has filed paperwork or announced their intentions.

Curlett, 45, who lives in the Oakenshawe neighborhood of North Baltimore, was an assistant district attorney with the Manhattan district attorney's office. He practices law with former federal prosecutor Steve Levin at Levin & Curlett LLC in Baltimore.

The Johns Hopkins University and Brooklyn Law School graduate began his career with the office of the prosecutor of the International Criminal Tribunal in The Hague, where he was involved in the investigation and trial of genocide committed in Srebrenica, Bosnia and Herzegovina in 1995, according to a biography on the firm's website. Ten years later he was part of a team that documented genocide in the Central African country of Chad.

He also served with the independent monitor for the Detroit Police Department under a federal consent decree. Baltimore officials are negotiating a consent decree with the federal Justice Department.

Curlett chaired a panel of the Greater Baltimore Committee in 2010 that made recommendations to then-incoming State's Attorney Gregg Bernstein on best ways to run the office.

"I won't sugarcoat it; Baltimore is in a state of crisis," Curlett said Monday in an email. "In recent years, Baltimore has seen an unprecedented increase in crime in its streets. The murder rate has escalated. Violent criminals do not fear prosecution because conviction rates have fallen and the revolving door of the criminal justice system too often returns them to the streets far too soon.

"My plan is a progressive, smart-on-crime approach that focuses on prosecuting violent criminals, early intervention in the lives of young people to prevent future crime, and reducing recidivism among non-violent offenders who will inevitably return to our communities. I will work closely with the Baltimore Police Department to restore the trust of the police in the state's attorney, so our citizens can place their trust and confidence in our local police."

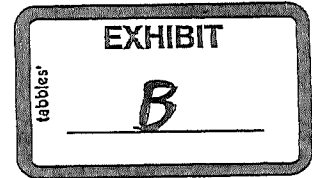
Mosby, who defeated Bernstein in 2014 to become state's attorney, faced praise and criticism for her prosecution of the six officers in Gray's death. The trial of the first ended in a hung jury, and the next three were acquitted.

Mosby then dropped all remaining charges against the officers still awaiting trial.

Curlett defended a Baltimore police officer accused of animal cruelty for slashing the throat of a dog and an off-duty New Jersey police officer who shot and killed a man in an alleged road rage incident in Anne Arundel County. Both officers were acquitted.

Curlett also represented a 15-year-old accused of stabbing cyclist Robert Ponsi to death in Waverly. The teen admitted to committing the stabbing, but Curlett convinced a judge to waive the case to juvenile court while two accomplices were tried and convicted as adults.

jfenton@baltsun.com



As of Property Data Search
 Search Results for BALTIMORE CITY

View GroundRent Redemption View GroundRent Registration

Account Identifier: Ward - 13 Section - 11 Block - 3446 Lot - 035

Owner Name: BATES IVAN J **Use:** RESIDENTIAL
Principal Residence: NO
Mailing Address: 724 RESERVOIR ST **Deed Reference:** /06667/ 00310
 BALTIMORE MD 21217-4632

Premises Address: 724 RESERVOIR ST **Legal Description:** 16-8X124-7
 BALTIMORE MD 21217-4632

Map:	Grid:	Parcel:	Sub District:	Subdivision:	Section:	Block:	Lot:	Assessment Year:	Plat No:
0013	0000	0000		0000	11	3446	035	2017	Plat Ref:
Special Tax Areas:				Town: NONE					
				Ad Valorem:					
				Tax Class:					
Primary Structure Built		Above Grade Living Area		Finished Basement Area		Property Land Area		County Use	
1905		2,692 SF						11320	
Stories	Basement	Type	Exterior	Full/Half Bath	Garage	Last Major Renovation			
3	YES	CENTER UNIT	BRICK	2 full/ 1 half					

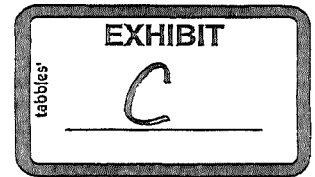
	Base Value	Value As of 01/01/2017	Phase-in Assessments As of 07/01/2016	As of 07/01/2017
Land:	69,000	69,000		
Improvements	151,200	169,100		
Total:	220,200	238,100	220,200	226,167
Preferential Land:	0			0

Seller: MOSE, JANICE	Date: 09/11/1997	Price: \$78,500
Type: ARMS LENGTH IMPROVED	Deed1: SEB /06667/ 00310	Deed2:
Seller: STEINBERG, PEGGY L	Date: 06/25/1992	Price: \$70,000
Type: NON-ARMS LENGTH OTHER	Deed1: /00000/ 00000	Deed2:
Seller: HAYWOOD, CHARLES	Date: 01/31/1990	Price: \$46,000
Type: ARMS LENGTH IMPROVED	Deed1: /00000/ 00000	Deed2:

Partial Exempt Assessments:	Class	07/01/2016	07/01/2017
County:	000	0.00	
State:	000	0.00	
Municipal:	000	0.00 0.00	0.00 0.00
Tax Exempt:	Special Tax Recapture:		
Exempt Class:	NONE		

Homestead Application Status: No Application

Homeowners' Tax Credit Application Status: No Application **Date:**



Real Property Data Search

Search Result for HOWARD COUNTY

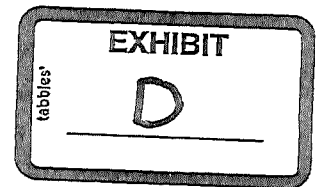
View Map		View GroundRent Redemption				View GroundRent Registration					
Account Identifier:		District - 06 Account Number - 571298									
Owner Information											
Owner Name:	BATES IVAN J				Use:	RESIDENTIAL					
					Principal Residence:	NO					
Mailing Address:	8743 WEATHERED STONE WAY LAUREL MD 20723-				Deed Reference:	/14370/ 00307					
Location & Structure Information											
Premises Address:		8743 WEATHERED STONE WAY LAUREL 20723-0000				Legal Description:	LOT 53 11789 SQ 8743 WEATHERED STONE WAY STONE LAKE RSB PAR E				
Map:	Grid:	Parcel:	Sub District:	Subdivision:	Section:	Block:	Lot:	Assessment Year:	Plat No:	15538	
0047	0009	1047		0000			53	2017			
Special Tax Areas:											
					Town:	NONE					
					Ad Valorem:	104					
					Tax Class:						
Primary Structure Built		Above Grade Living Area		Finished Basement Area		Property Land Area		County Use			
2012		4,171 SF		1600 SF		11,789 SF		000000			
Stories	Basement	Type	Exterior	Full/Half Bath	Garage	Last Major Renovation					
2	YES	STANDARD UNIT	SIDING	3 full/ 1 half	1 Attached						
Value Information											
			Base Value	Value	Phase-in Assessments						
				As of	As of		As of				
				01/01/2017	07/01/2017		07/01/2018				
Land:			281,700	281,700							
Improvements			517,900	576,800							
Total:			799,600	858,500	819,233		838,867				
Preferential Land:			0		0						
Transfer Information											
Seller: NEW LAND LOTS LC				Date: 10/12/2012			Price: \$895,762				
Type: ARMS LENGTH IMPROVED				Deed1: /14370/ 00307			Deed2:				
Seller: STONE LAKE CORPORATION				Date: 12/16/2008			Price: \$4,223,835				
Type: ARMS LENGTH MULTIPLE				Deed1: /11441/ 00469			Deed2:				
Seller:				Date:			Price:				
Type:				Deed1:			Deed2:				
Exemption Information											
Partial Exempt Assessments:		Class		07/01/2017			07/01/2018				
County:		000		0.00							
State:		000		0.00							
Municipal:		000		0.00 0.00			0.00 0.00				
Tax Exempt Exempt Class:				Special Tax Recapture:							
				NONE							

Homestead Application Information

Homestead Application Status: Denied

Homeowners' Tax Credit Application Information

Homeowners' Tax Credit Application Status: No Application Date:



Real Property Data Search

Search Result for BALTIMORE CITY

View GroundRent Redemption				View GroundRent Registration					
Account Identifier:		Ward - 24 Section - 11 Block - 2024 Lot - 008J							
Owner Information									
Owner Name:		ASUNCION VALENTION A BATES IVAN		Use: Principal Residence:		RESIDENTIAL YES			
Mailing Address:		1614 RAMPART MEWS BALTIMORE MD 21230-0000		Deed Reference:		/17787/ 0427			
Location & Structure Information									
Premises Address:				Legal Description:		0.021 ACRES			
BALTIMORE 21230-0000									
Map:	Grid:	Parcel:	Sub District:	Subdivision:	Section:	Block:	Lot:	Assessment Year:	Plat No:
0024					11	2024	008J	2018	Plat Ref:
Special Tax Areas:				Town:		NONE			
				Ad Valorem:					
				Tax Class:					
Primary Structure Built		Above Grade Living Area		Finished Basement Area		Property Land Area		County Use	
2015		2,204 SF				0.0210 AC		11130	
Stories	Basement	Type	Exterior	Full/Half Bath	Garage	Last Major Renovation			
3	NO	CENTER UNIT	1/2 BRICK SIDING	2 full/ 2 half	1 Attached	2015			
Value Information									
		Base Value		Value		Phase-in Assessments			
				As of		As of		As of	
				01/01/2015		07/01/2017		07/01/2018	
Land:		130,000		130,000					
Improvements		357,700		357,700					
Total:		487,700		487,700		487,700			
Preferential Land:		0							
Transfer Information									
Seller: BEAZER HOMES CORP				Date: 01/08/2016		Price: \$519,900			
Type: ARMS LENGTH VACANT				Deed1: LGA /17787/ 0427		Deed2:			
Seller: BEAZER HOMES CORP				Date: 12/22/2015		Price: \$504,990			
Type: ARMS LENGTH VACANT				Deed1: LGA /17745/ 0467		Deed2:			
Seller: LP TOWNS, LLC				Date: 04/30/2015		Price: \$1,550,000			
Type: NON-ARMS LENGTH OTHER				Deed1: LGA /17115/ 0500		Deed2:			
Exemption Information									
Partial Exempt Assessments:		Class		07/01/2017		07/01/2018			
County:		000		0.00					
State:		000		0.00					
Municipal:		000		0.00		0.00			

Tax Exempt:
Exempt Class:

Special Tax Recapture:
NONE

Homestead Application Information

Homestead Application Status: Approved 03/16/2017

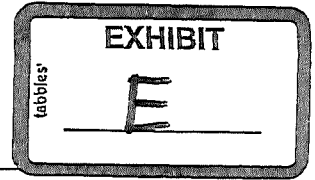
Homeowners' Tax Credit Application Information

Homeowners' Tax Credit Application Status: No Application

Date:



Maryland State Board of Elections



Candidate Committee Statement of Organization

Candidate Committee Name: Bates, Ivan Friends of Established Date: 03/27/2017

CANDIDATE	
Full Name : <i>BATES, IVAN JULES</i>	Name on Ballot :
Date of Birth : <i>09/07/1968</i>	County of Residence : <i>Baltimore City</i>
Residence Address : <i>1614 Rampart Mews, Baltimore, Maryland 21230</i>	
Mailing Address : <i>201 N. Charles Street, Suite 1900, Baltimore, Maryland 21201</i>	
Public Phone : <i>(410) 814-4600</i>	Fax : <i>(410) 814-4604</i>
Email : <i>ivan@ivanbates.com</i>	
<input checked="" type="checkbox"/> I hereby authorize the above named committee to raise and spend campaign funds for my candidacy.	
Candidate Signature: <u>BATES, IVAN JULES</u>	Date: <u>03/27/2017</u>

ELECTION PARTICIPATION		
Election	Office Sought *	Jurisdiction *
Gubernatorial		

* Does not constitute filing a certificate and candidacy

Compliance materials will be provided to the Chairperson, Treasurer and Candidate upon receipt and acceptance of this document.

Compliance information is available on the State Board of Elections website www.electionsmaryland.com



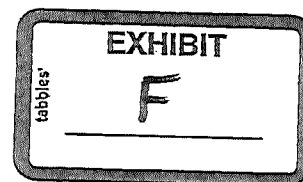
Maryland State Board of Elections

APPOINTMENT OF CHAIRPERSON		
<input type="checkbox"/> The Chairperson is also the Candidate		
Full Name : <i>Brown-Mathews, Marsha</i>	Date of Birth : <i>10/27/1949</i>	Registered Voter of County : <i>Baltimore Co.</i>
Residence Address : <i>1859 Wycliffe Road, Baltimore, Maryland 21234</i>		
Mailing Address : <i>P.O. Box 1166, Baltimore, Maryland 21203</i>		
Public Phone : <i>(410) 837-2009</i>	Fax : <i>(410) 244-9510</i>	
Email : <i>heartfelt34medic@verizon.net</i>		
<input checked="" type="checkbox"/> I accept the appointment of Chairperson until the final campaign finance report required by § 13-311 of the Election Law Article is filed or until a successor is duly chosen and qualifies. I understand that I am required to follow the provisions of Title 13 of the Election Law Article, Annotated Code of Maryland with regard to the manner in which this committee receives, spends, and reports money or valuable things to support/oppose State and local candidates or ballot issues. I understand that if I wish to resign, I must do so in writing, on the proper form, and file the resignation with the State Board of Elections.		
Chairperson Signature: <u><i>Brown-Mathews, Marsha</i></u>		Date: <u><i>03/27/2017</i></u>

APPOINTMENT OF TREASURER		
Full Name : <i>FLYNN, CATHERINE</i>	Date of Birth : <i>07/03/1961</i>	Registered Voter of County : <i>Baltimore City</i>
Residence Address : <i>303 Cedarcroft Road, Baltimore, Maryland 21212</i>		
Mailing Address : <i>217 N. Charles Street, 2nd Floor, Baltimore, Maryland 21201</i>		
Public Phone : <i>(410) 440-0462</i>	Fax :	
Email : <i>cflynn@catflynnlaw.com</i>		
<input checked="" type="checkbox"/> I accept the appointment of Treasurer until the final campaign finance report required by § 13-311 of the Election Law Article is filed or until a successor is duly chosen and qualifies. I understand that I am required to follow the provisions of Title 13 of the Election Law Article, Annotated Code of Maryland with regard to the manner in which this committee receives, spends, and reports money or valuable things to support/oppose State and local candidates or ballot issues. I understand that if I wish to resign, I must do so in writing, on the proper form, and file the resignation with the State Board of Elections.		
Treasurer Signature: <u><i>FLYNN, CATHERINE</i></u>		Date: <u><i>03/27/2017</i></u>

Compliance materials will be provided to the Chairperson, Treasurer and Candidate upon receipt and acceptance of this document.

Compliance information is available on the State Board of Elections website www.electionsmaryland.com



Defense attorney Bates forms campaign committee for Baltimore State's Attorney

Justin Fenton
March 30, 2017

Defense attorney Ivan J. Bates said in an email to supporters Wednesday that he is considering a run for Baltimore State's Attorney and has formed a candidate committee.

Bates, 48, is a former city prosecutor who tried homicides and has been a defense attorney for the past 15 years, including representing one of the officers charged in the death of Freddie Gray. Campaign finance records show Bates filed paperwork necessary to raise money earlier this week.

"I definitely think I've heard from a lot of people that we need to have change," Bates said in an interview Thursday. "Right now I'm just exploring that opportunity, to sit down and talk to the voters, to make sure that I'm the individual that the community wants to be that change agent."

Bates' announcement comes as incumbent State's Attorney Marilyn J. Mosby is set to hold a fundraiser Thursday night at the Ritz Carlton Estates in Federal Hill. The event is billed as a reception honoring Mosby with special guest U.S. Rep. Elijah E. Cummings.

Among the supporters for the event listed at the top of a flier are attorney William H. "Billy" Murphy Jr., the attorney who represented Gray's family after his death, former State's Attorney Stuart O. Simms, and former Rep. Kweisi Mfume.

"She's been a passionate advocate for victims, and equally as enthusiastic in terms of her crime-fighting," Simms said. "I supported her in the general election last time, and will continue to do so."

Mosby raised about \$23,000 in the year preceding the most recent campaign finance reporting period that ended in January. She had about \$28,080 cash on hand.

If Bates enters the race, he will join attorney Chad Curlett in facing off against Mosby in the Democratic primary election in June 2018. Curlett confirmed earlier this year his intention to run.

Bates said he moved back to Baltimore earlier this year, and records show he resides in Locust Point. In his email to supporters, he cited the city's record-high murder rate and a "severe erosion of trust when it comes to relations between our communities and the criminal justice system."

"As a defense attorney and a former prosecutor, with decades of experience in the courtroom, I see the impacts of this crime every day in our city. It is standing in the way of progress," Bates said. "I, for one, have had enough."

Bates represented Baltimore Police Sgt. Alicia White, who was charged with manslaughter in Gray's death. White's case was dropped by Mosby's office before going to trial following a mistrial and three acquittals in other officers' cases.

Bates' campaign treasurer is listed as veteran defense attorney Catherine Flynn, who represented another officer charged in Gray's death, Garrett Miller.

jfenton@baltsun.com

twitter.com/justin_fenton

baltimoresun.com



Baltimore state's attorney race kicks off with Bates campaign launch

Pamela Wood
August 26, 2017

The contest to become Baltimore's top prosecutor kicked off in earnest Saturday, as defense attorney Ivan J. Bates launched his campaign at a Park Heights home where a young father was fatally shot in 2015.

Bates, a Democrat, is the first candidate to publicly launch a campaign to challenge incumbent State's Attorney Marilyn Mosby, in what could become a crowded race.

Challengers are lining up against Mosby, a Democrat who has come under fire as Baltimore's homicide rate has soared and her office has had to throw out dozens of cases because of potential problems with evidence exposed by police body-camera footage.

She has also earned both criticism and praise for her handling of cases against six officers accused in the arrest and death of Freddie Gray in 2015. None of the officers was convicted

Two other Democrats are weighing challenges against Mosby.

Defense attorney Charles N. "Chad" Curlett Jr. has said he intends to run. And former state deputy attorney general Thiru Vignarajah said Saturday that he, too, is "seriously considering" running.

Vignarajah, who is now in private practice, represented the state in opposing a new trial for convicted murderer Adnan Syed, whose case was the focus of the popular "Serial" podcast.

"Defense attorneys jumping in is a symptom of widespread frustration and heartbreak with what's happening," Vignarajah said.

Meanwhile, an anti-Mosby political action committee, Bmore Safe Now, was formed this summer.

As of Saturday morning, Baltimore has recorded 229 homicides this year, following 318 homicides in 2016 and 344 in 2015.

Mosby has not launched a re-election campaign, but she has held campaign fundraisers. A campaign adviser declined to comment on the criticism leveled against Mosby or when she might kick off her campaign.

Without mentioning Mosby by name, Bates said Mosby has failed to do her part to stem the rising tide of violence in the city.

“We are losing our city to crime. We are constantly in a state of mourning,” Bates said, as he promised a crowd of dozens of supporters that he would help reverse the rising crime rates in the city. “Because nearly every day since 2015 at least another person is murdered. Under our current state’s attorney, we are on pace for our third consecutive year of 300-plus murders.”

Bates said he would be tough on violent repeat offenders while, at the same time, showing discretion for low-level offenders, offering drug and mental health treatment and job placement services.

Bates held his campaign announcement at the former home of Kendal Fenwick, a 24-year-old father of three who was shot to death in 2015 as homicides began to soar in Baltimore.

Fenwick’s father, Kevin, was among those who spoke in support of Bates’ candidacy. He said the man accused in his son’s killing was a repeat offender who should not have been on the streets.

“If the current state’s attorney would have done her job, my son may still be living today,” Kevin Fenwick said. “I speak for many grieving parents in this city. I don’t want anyone else to feel the way me and my family are feeling.”

Police initially said that Fenwick may have been targeted because he was building a fence to prevent drug dealers from coming into his yard. Days after Fenwick’s death, neighbors, community leaders and police officers descended on his home on Park Heights Avenue to finish building the fence, with Bates’ law firm donating the lumber.

But prosecutors said in June that Fenwick’s death likely was a case of mistaken identity. A man was charged in Fenwick’s death, but a mistrial was declared in June.

Bates said Fenwick’s death caused him to reflect on whether there was something more he could do to help the city.

“I am tired of our city losing an entire generation. I am tired of it being acceptable for so many to be killed and victimized in Baltimore when it is not acceptable anywhere else,” he said.

Bates has said he recently moved back to Baltimore, where he began his legal career in 1995 after graduating from law school. Bates is registered to vote at a property he owns in Locust Point but also still owns a home in Howard County, according to public records.

Bates gained prominence in 2015 as one of the defense attorneys for the six city officers involved in the Gray case. Gray died in April that year after he was injured in the back of a police van. His death sparked outrage in the community and rioting, looting and arsons took place on the day of his funeral.

Bates represented Sgt. Alicia White, one of the two supervisors who was charged in the case.

Asked whether he could convince the public that he could restore confidence in the justice system when he has represented White and other officers accused of wrongdoing, Bates responded that everyone accused of a crime has a constitutional right to legal defense.

Brittany Gause, an attorney who handles civil cases, attended the campaign event and said she believes Bates will restore trust in the state's attorney's office.

"The most important part he said was about rebuilding confidence in the state's attorney's office," Gause said. "There's a credibility issue that we have to take into consideration."

Justin M. Hollimon, a private defense attorney, said he supports Bates' promise to use compassion and discretion in handling low-level offenders. Simply locking everyone up is not what Baltimore needs, Hollimon said.

"For the segment of the community that's not violent offenders, compassion is important," he said.

The Democratic primary is in June. No Republicans have announced intentions to run.

Baltimore Sun reporter Justin Fenton contributed to this article.

(Editor's note: An earlier version of this article gave an incorrect title for Thiru Vignarajah's former position in the state attorney general's office. The Baltimore Sun regrets the error.)